## Impact Area Review Team Meeting Bourne Bridge Best Western Bourne, Massachusetts July 27, 2000 6:00 p.m.

# **Meeting Minutes**

Member:	Organization:	Telephone:	<u>Fax:</u>	E-Mail:
Todd Borci	US EPA	617-918-1358		borci.todd@epa.gov
Jane Dolan	US EPA	617-918-1272		dolan.jane@epa.gov
Margery Adams	US EPA	617-918-1733	617-918-1809	adams.margery@epa.gov
Jan Drake	MA DEP	508-946-2841		janice.drake@state.ma.us
Ellie Grillo	MA DEP	508-946-2866		
CPT William Myer	NGB/IAGWSO	508-968-5821	508-968-5286	mmreis@tiac.net
LTC Donald E. Bailey	MASS ARNG	508-968-5883	508-968-5906	cmdrcped@shore.net
Shaun Cody	MANG	508-233-6520	508-233-6571	envcody@aol.com
Ben Gregson	MMARNG/IAGWSO	508-968-5821	508-968-5286	mmreis@tiac.net
Bob Burt	102 <sup>nd</sup> FW	508-968-4234		
Marty Aker	AFCEE	508-968-4670	508-968-4479	marty.aker@mmr.brooks.af. mil
Kent Gonser	JPO	508-968-5824		
Tom Cambareri	CCC	508-362-3828	508-362-3136	water@cape.com
James Graham	JPAT	508-563-5814		•
Ray Taylor	JPAT	508-539-1709		raydtaylor@cape.com
aul Zanis س	Citizen	508-539-2852	508-539-9878	zap59@aol.com
Peter Schlesinger	Citizen	508-540-9900	508-540-9700	pschles@whrc.org
Joel Feigenbaum	ABC/JPAT	508-833-0144		-
Richard Hugus	Citizen	508-540-6034		rhugus@cape.com
Facilitator:	Organization:	Telephone:	Fax:	E-Mail:
Facilitator: Austine Frawley	Organization: US EPA	<b>Telephone:</b> 617-918-1065	<u>Fax:</u> 617-918-0065	E-Mail: frawley.austine@epa.gov
			<del></del>	
Austine Frawley  Attendee:	US EPA Organization:	617-918-1065 <u>Telephone:</u>	617-918-0065 <u>Fax:</u>	frawley.austine@epa.gov  E-Mail:
Austine Frawley  Attendee:  Patricia Culligan	US EPA Organization: TOSC	617-918-1065 <b>Telephone:</b> 617-252-7093	617-918-0065	frawley.austine@epa.gov  E-Mail: trishch@mit.edu
Austine Frawley  Attendee:  Patricia Culligan Jim Stahl	US EPA  Organization: TOSC TOSC	617-918-1065  Telephone: 617-252-7093 781-255-5537	617-918-0065 <u>Fax:</u>	frawley.austine@epa.gov  E-Mail:  trishch@mit.edu jim_stahl@bogfppt.com
Austine Frawley  Attendee:  Patricia Culligan Jim Stahl Phil Gschwend	US EPA  Organization:  TOSC TOSC TOSC	617-918-1065 <b>Telephone:</b> 617-252-7093	617-918-0065  Fax: 617-253-6044	frawley.austine@epa.gov  E-Mail: trishch@mit.edu
Austine Frawley  Attendee:  Patricia Culligan Jim Stahl	US EPA  Organization: TOSC TOSC	617-918-1065  Telephone: 617-252-7093 781-255-5537 617-253-1638	617-918-0065  Fax: 617-253-6044 617-253-9723	frawley.austine@epa.gov  E-Mail:  trishch@mit.edu jim_stahl@bogfppt.com
Austine Frawley  Attendee:  Patricia Culligan Jim Stahl Phil Gschwend Charles Harvey	US EPA  Organization:  TOSC TOSC TOSC TOSC TOSC	617-918-1065 <b>Telephone:</b> 617-252-7093 781-255-5537 617-253-1638 617-258-0392	617-918-0065  Fax: 617-253-6044 617-253-9723	frawley.austine@epa.gov  E-Mail:  trishch@mit.edu jim_stahl@bogfppt.com pmgschwe@mit.edu  mike.minior@mmr.brooks.af.
Austine Frawley  Attendee:  Patricia Culligan Jim Stahl Phil Gschwend Charles Harvey Robert Gill Mike Minior	US EPA  Organization:  TOSC TOSC TOSC TOSC AFCEE AFCEE	617-918-1065  Telephone: 617-252-7093 781-255-5537 617-253-1638 617-258-0392 508-968-4670 508-968-4670	617-918-0065  Fax: 617-253-6044 617-253-9723 617-258-8850 508-968-4673	frawley.austine@epa.gov  E-Mail:  trishch@mit.edu jim_stahl@bogfppt.com pmgschwe@mit.edu
Austine Frawley  Attendee:  Patricia Culligan Jim Stahl Phil Gschwend Charles Harvey Robert Gill Mike Minior  COL Freeman	US EPA  Organization:  TOSC TOSC TOSC TOSC AFCEE AFCEE JPO	617-918-1065  Telephone: 617-252-7093 781-255-5537 617-253-1638 617-258-0392 508-968-4670 508-968-4670	617-918-0065  Fax: 617-253-6044 617-253-9723 617-258-8850	frawley.austine@epa.gov  E-Mail:  trishch@mit.edu jim_stahl@bogfppt.com pmgschwe@mit.edu  mike.minior@mmr.brooks.af.
Austine Frawley  Attendee:  Patricia Culligan Jim Stahl Phil Gschwend Charles Harvey Robert Gill Mike Minior  COL Freeman Jim Murphy	US EPA  Organization:  TOSC TOSC TOSC TOSC AFCEE AFCEE JPO US EPA	617-918-1065 <b>Telephone:</b> 617-252-7093 781-255-5537 617-253-1638 617-258-0392 508-968-4670 508-968-4670 508-968-5908 617-918-1028	617-918-0065  Fax: 617-253-6044 617-253-9723 617-258-8850 508-968-4673	frawley.austine@epa.gov  E-Mail:  trishch@mit.edu jim_stahl@bogfppt.com pmgschwe@mit.edu  mike.minior@mmr.brooks.af.
Austine Frawley  Attendee:  Patricia Culligan Jim Stahl Phil Gschwend Charles Harvey Robert Gill Mike Minior  COL Freeman Jim Murphy Michael Jasinski	US EPA  Organization:  TOSC TOSC TOSC TOSC AFCEE AFCEE AFCEE JPO US EPA US EPA	617-918-1065  Telephone: 617-252-7093 781-255-5537 617-253-1638 617-258-0392 508-968-4670 508-968-4670 508-968-5908 617-918-1028 617-918-1352	617-918-0065  Fax: 617-253-6044 617-253-9723 617-258-8850 508-968-4673	frawley.austine@epa.gov  E-Mail:  trishch@mit.edu jim_stahl@bogfppt.com pmgschwe@mit.edu  mike.minior@mmr.brooks.af.
Austine Frawley  Attendee:  Patricia Culligan Jim Stahl Phil Gschwend Charles Harvey Robert Gill Mike Minior  COL Freeman Jim Murphy Michael Jasinski Millie Garcia-Surette	US EPA  Organization:  TOSC TOSC TOSC TOSC AFCEE AFCEE JPO US EPA US EPA MA DEP	617-918-1065 <b>Telephone:</b> 617-252-7093 781-255-5537 617-253-1638 617-258-0392 508-968-4670 508-968-4670 508-968-5908 617-918-1028	617-918-0065  Fax: 617-253-6044 617-253-9723 617-258-8850 508-968-4673	frawley.austine@epa.gov  E-Mail:  trishch@mit.edu jim_stahl@bogfppt.com pmgschwe@mit.edu  mike.minior@mmr.brooks.af.
Austine Frawley  Attendee:  Patricia Culligan Jim Stahl Phil Gschwend Charles Harvey Robert Gill Mike Minior  COL Freeman Jim Murphy Michael Jasinski Millie Garcia-Surette Lori Ferreria	US EPA  Organization:  TOSC TOSC TOSC TOSC AFCEE AFCEE  JPO US EPA US EPA US EPA MA DEP MA DEP	617-918-1065  Telephone: 617-252-7093 781-255-5537 617-253-1638 617-258-0392 508-968-4670 508-968-4670 508-968-5908 617-918-1028 617-918-1352 508-946-2727	617-918-0065  Fax: 617-253-6044 617-253-9723 617-258-8850 508-968-4673	frawley.austine@epa.gov  E-Mail:  trishch@mit.edu jim_stahl@bogfppt.com pmgschwe@mit.edu  mike.minior@mmr.brooks.af.
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Jason Alves	IAGWSP	508-968-5821		
Nick Iaiennaro	IAGWSP			
Corey Snyder	MAARNG ENV	508-968-5834	508-968-5820	
Dave Jacobson	MAARNG	508-968-5834	508-968-5820	
Marc Grant	Ogden Environmental	978-692-9090	978-692-6633	magrant@oees.com
Rob Clemens	Ogden Environmental	978-692-9090		8
Herb Colby	Ogden Environmental			
Kim Harris	Ogden Environmental			
Kristin Smith	ETC	508-563-3648		
Doug Larson	Envirogen	781-821-5560		larson@envirogen.com
Shelly Lam	Tetra Tech	508-563-1225		<u> </u>
Leo Montroy	Tetra Tech	508-563-1225	508-563-1269	
Mark Hutson	Foothill Engineering	303-278-0622	303-278-0624	
Mark Forest	Rep Delahunt's Office			
David Dow	Sierra Club	508-540-7142		
Kevin Dennehy	Cape Cod Times	508-888-5454		
Marty Howell	•			
Jane Moran	CH2M HIII	508-759-9114	508-759-7703	jmoran1@ch2m.com
Mary Meli	CH2M HIII	508-759-2392		mmeli@ch2m.com
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# Agenda Item #1. Welcome, Introductions, and Approval of June 28, 2000 Meeting Minutes

Ms. Frawley convened the meeting at 6:02 p.m. and welcomed the attendees. She announced that Mr. Bill Walsh-Rogalski from the United States Environmental Protection Agency (EPA), Mr. Len Pinaud from the Massachusetts Department of Environmental Protection (DEP), and LTC Knott were unable to attend tonight's meeting. She briefly reviewed the handouts, and the team members introduced themselves. She asked if there were any changes to the June 28, 2000 Impact Area Review Team (IART) meeting minutes. Mr. Hugus noted that Mr. Bill LiBrizzi's name was misspelled on page 21. The minutes were approved with this change.

## Review of Agenda

Ms. Frawley reviewed the draft agenda and asked if there were any changes or additions. Mr. Schlesinger said that he needed five minutes under "Other Items" to discuss the Technical Outreach Services for Communities (TOSC) support. Mr. Hugus asked why small arms range sampling is not on the agenda. Ms. Frawley said that small arms range sampling will be discussed under "Field Investigation Update." She explained that the agenda that was distributed is not complete, and she apologized for the administrative error. Dr. Feigenbaum said that Mr. Dick Judge, Sandwich Selectman and Senior Management Board (SMB) member, asked that the IART discuss the recent disposal of munitions at the J-2 range. Ms. Frawley noted that the J-2 range also will be covered under "Field Investigations Update." Dr. Feigenbaum stated that his agenda did not have the itemized subjects listed. Ms. Frawley reiterated that the agenda that was distributed was the result of an administrative oversight. She said that she will work with the new contractor to make sure that it will not happen again. Dr. Feigenbaum commented that there was never a problem before and asked Ms. Frawley if the oversight occurred now because she has been given assistance. Mr. Frawley explained that the oversight was due to a lack of communication. Ms. Frawley then reviewed the specific topics that should appear on the agenda.

## Review of Action Items

1. COL Bailey's letter of response regarding active ranges on Greenway Road will be distributed to the Impact Area Review Team (IART) in the next weekly mailing.

Ms. Frawley stated that COL Bailey's letter was mailed to the IART on July 3, 2000. Mr. Hugus explained that the citizen members had made the request to stop small arms firing near Greenway Road out of respect for the residents in the area. He asked if it was true that one day of firing on Greenway Road consisted of 16,000 M-16 rounds. COL Bailey explained that 16,000 rounds have been fired over the two and a half years that the ranges have been in use. Mr. Zanis pointed out that the ranges were only used four times in the two and a half years. COL Bailey concurred that the ranges were only used four times in that time period. Mr. Hugus noted that that is an average of 4000 rounds per day of use. COL Bailey agreed. Mr. Hugus said that 4000 rounds in one day is a heavy noise nuisance for the area residents. He also said that COL Bailey had said that the ranges would not be used unless necessary. He then asked COL Bailey to reconsider the decision from a public relations point of view. He said that 4000 rounds in one day is quite a bit of firing for the people who live just a few hundred feet away from the ranges. COL Bailey stated that no complaints have been filed regarding the firing in the last two and a half years that the ranges have been in use. He stated that the Guard has taken the public into consideration, which is why the ranges were used only four times in the last two and a half years. COL Bailey added that the ranges will be used only if operation or requirements dictate.

Dr. Feigenbaum asked COL Bailey to define a situation that would constitute the use of the ranges. COL Bailey replied that the use of the ranges is dependent on supply and demand. He said that the ranges are more likely to be used in the fall and he noted that four times in two and a half years is not excessive. Dr. Feigenbaum clarified that COL Bailey has said that the ranges will be used only if they have to be. He then said at last night's SMB meeting he discussed this issue with COL Carter, the base commander. He reported that COL Carter defined the contingency of the ranges being used as nothing short of a call-up of the National Guard. He asked COL Bailey if he agrees with COL Carter's interpretation. COL Bailey replied that he does not. Dr. Feigenbaum said that he is getting two different stories from two different colonels. He then suggested that the Guard schedule the use of small arms ranges so that Greenway Road does not have to be utilized. COL Bailey stated that the decision to keep the ranges open was reached after careful consideration. He noted that the post commander and Adjutant General were consulted and the decision was made that if operation dictates, the ranges will be used; otherwise, they will be avoided whenever possible. Dr. Feigenbaum asked Mr. Zanis if he interpreted COL Carter the same way he did. Mr. Zanis said that he did. Dr. Feigenbaum asked COL Bailey to provide a written statement defining the conditions under which the small arms ranges on Greenway Road would be used. COL Bailey agreed to do so.

2. The Air and Soil Sampling Plan for the active ranges will also be included in the next weekly mailing.

Mailed 7/3/00

3. Dr. Feigenbaum requested the regulators' assistance in obtaining an inventory of artillery weapons systems that are no longer in use.

(see attachment #1)

COL Bailey said that there are currently 16 artillery pieces in the Unit Training Equipment Site (UTES), all of which are being used for crew and driver training. However, ten of the artillery pieces are going to be relocated to other sites. Dr. Feigenbaum asked COL Bailey if there are only 16 mobile guns at the UTES. COL Bailey replied that there are. Dr. Feigenbaum noted that he saw a lot more vehicles than that, and he suggested that perhaps COL Bailey is using a narrow definition of the vehicles in question. COL Bailey replied that currently there are 16 artillery pieces; some have been moved to Fort Dix. Dr. Feigenbaum asked COL Bailey if the artillery pieces were moved within the last few months. COL Bailey replied that he believes the artillery pieces were moved to Fort Dix within the last six months. Dr. Feigenbaum asked COL Bailey if mortars or tanks are stored at the UTES. COL Bailey replied that there are no mortars or tanks at the UTES. He noted that there are tracked vehicles, which are used as personnel carriers at the UTES. Dr. Feigenbaum asked how many tracked vehicles are at the site. COL Bailey replied that there are approximately 75 to 78 tracked vehicles there. Dr. Feigenbaum thanked COL

Mr. Hugus asked COL Bailey for a written inventory, which was originally requested, of the UTES site, including the tracked vehicles. COL Bailey said that he will provide a written inventory to the team.

Mr. Hugus then noted that the response to action item #2 is that the Air and Soil Sampling Plan for the small arms ranges was mailed out on July 3, 2000. He said that he has not received the plan. Mr. Borci said that he knows that at least some of the team members have seen the plan because he received comments from Dr. Feigenbaum and several other team members. Mr. Hugus acknowledged that he had commented on a two-page attachment, but not on an actual plan. Mr. Borci said that the comments that were made on the two-page attachment, which is essentially the plan, have been incorporated, and a revised version was mailed to the IART this week. He said that he was hoping to receive any final comments tonight and reach an agreement so that the soil sampling plan could be implemented as soon as possible. He noted that some of the air sampling already has been conducted. Mr. Hugus reiterated that the two-page attachment he received was nothing like a plan. Mr. Borci explained that the EPA did not task the Guard to conduct this sampling; the Guard is doing the sampling to address citizen comments. Therefore, a typical workplan was not submitted.

Dr. Feigenbaum asked if anybody has a copy of the revised plan. Ms. Adams said that she has a copy, and she agreed to make copies for the team.

4. Mr. Aker will present the cross-section and plan view of Chemical Spill 19 (CS-19) at the next IART meeting.

IRP has been invited to brief at the next IART meeting.

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Mr. Zanis requested that all identified plumes be depicted on all IART maps.

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The IART will receive a copy of the propellant investigation technical memorandum in the next weekly mailing.

Mailed 7/6/00 – Tech Memo #3, Gun and Mortar Firing Positions.

7. Mr. Hugus requested that Mr. Grant include high-concentration contours on the maps.

At the 6/29/00 Tech Meeting, it was agreed that a 100-parts per billion (ppb) RDX contour be added to the Demo Area 1 plume.

8. Mr. Zanis requested that Ogden distribute progress reports in a more timely fashion.

At the 6/29/00 Tech Meeting, it was agreed that Ogden will produce progress reports in a more timely manner.

9. Tetra Tech will provide updates on the Unexploded Ordnance (UXO) Survey at future IART meetings.

7/27/00 Agenda Item

10. The technical meeting will address the feasibility of sampling plants for the uptake of contaminants.

Ms. Frawley stated that a literature research is being currently conducted and there is nothing to report at this time on sampling plants for the uptake of contaminants.

11. Status of MA ANGB response to EPA's request for an updated inventory of the ASP.

(see attachment #2)

Ms. Frawley reported that a response from the Massachusetts Air National Guard (MA ANGB) to the EPA regarding an inventory of the ammunition supply point (ASP) is included in tonight's handouts. Mr. Hugus said that he has not had time to read the response, and asked if someone could summarize it. COL Bailey replied that the response does not provide a current inventory of the ASP but does list everything that has been shipped out. Ms. Adams concurred that it was EPA's understanding that the only thing that was provided from GEN Keefe was a list of items that have been shipped out. She said that EPA is concerned that it is impossible to acquire an actual inventory of the ASP and is currently considering how to respond to GEN Keefe.

Mr. Hugus said that he is concerned that the IART's request is not being accommodated. He noted that the IART started asking about the ASP approximately four months ago, and he does not understand why the Guard is not willing to provide the inventory as it did last year. He encouraged EPA to follow up on this matter. He also stated that he thinks that the citizens have a right to know what is in the ASP because of environmental concerns, and because of concerns about items being stored there that are no longer legal to fire at Camp Edwards. He noted that it was over a year ago that the Guard had to blow up a case of artillery simulators, and blow-inplace events should be avoided whenever possible. Mr. Hugus commented that the response from GEN Keefe is not good enough. He asked that this item be included on the next IART meeting agenda.

Mr. Schlesinger asked for confirmation that GEN Keefe provided a list of items that have been shipped out. Ms. Adams confirmed that that is correct. Mr. Schlesinger asked if it would make					
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sense then to subtract those items from the old inventory in order to determine the contents of the ASP. Mr. Hugus pointed out that the items that have been shipped to the ASP are not known. Mr. Schlesinger suggested that someone from the EPA with the appropriate clearance review the ASP inventory.

Mr. Borci stated that the list provided by GEN Keefe only lists high explosives (HE). However, pyrotechnics and other mixtures that are not currently being used on the base are of interest to the IART. He remarked that the list from GEN Keefe is basically useless. He then reported that the Guard agreed to provide EPA with a complete inventory, if EPA did not make it public. The EPA's response to the Guard was that it is not willing to keep the inventory from the public. Mr. Borci stated that EPA currently is trying to determine out how best to approach the situation.

Ms. Adams agreed with Mr. Hugus that the public has the right to know what is contained in the ASP, which is why EPA is not willing to look at the data under the Guard's proposed terms.

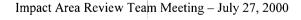
Mr. Hugus asked COL Bailey why the public is not allowed to know what is contained in the ASP. COL Bailey replied that the primary reason is one of security. He used the example of a bank not advertising how much money is in its vault and citizens not advertising where valuables are kept in their homes. He explained that a public inventory of the ASP would provide a very lucrative target for any type of terrorist group. He noted that even small arms bullets are a sought-after item in the world. Therefore, the list is not made public for the security of the personnel and for operational security.

Mr. Hugus commented that the difference is that banks and private citizens with caches of jewelry have not been polluting the groundwater and are not a threat to the environment. He said that the base has used the national security argument in the past to keep citizens from knowing what they have a right to know. He also stated that it is the citizens that the Guard is trying to protect and it is the citizens that are asking for the information. Mr. Hugus said that he does not think that COL Bailey has a good argument for not releasing the inventory.

Mr. Schlesinger said that he can understand COL Bailey's argument. He then suggested that the IART be provided with a list of constituents, which is really what the team needs, rather than a full inventory. COL Bailey pointed out that the original request was for an inventory. Mr. Schlesinger agreed, but said that the IART does not necessarily need quantities, but rather a list of the constituents of the items contained in the ASP. COL Bailey agreed to find out whether such a list could be provided to the team.

Dr. Feigenbaum stated that it seems to him that the National Guard Bureau (NGB) has the resources to secure the ASP and its contents. He noted that there are other areas on the base that contain more lucrative hardware, which is more desirable than the Guard's ASP. He said that ASP in question probably houses a small increment of total assets, and it sounds to him like the Guard is offering an excuse for not releasing the inventory. He said that all these excuses make him feel like the Guard is covering something up, and there is something in the ASP that should not be there.

Mr. Aker referred to action item # 4 regarding the CS-19 presentation. He reported that when he asked about presenting to the IART about CS-19 at tonight's meeting, he was told that a CS-19 presentation was scheduled for the August 22, 2000 Joint Process Action Team (JPAT) meeting. Also, a subsequent presentation would be given to the SMB. He noted that therefore, he will not be presenting this evening.



Ms. Frawley acknowledged that it is appropriate that the CS-19 presentation first be made to the JPAT and SMB. She then asked Mr. Aker if the IART could request a CS-19 presentation at a future meeting.

Mr. Minior stated that the situation is a bit more complicated. He explained that the Installation Restoration Program (IRP) will present the information to the JPAT, which is the IRP's forum for technical information. He noted that the IRP also provides that information to the NGB team and to Ogden, and Mr. Grant's presentation will include an outline of the CS-19 plume. However, the IRP will not be presenting in this forum.

Ms. Adams requested that the IRP reconsider making a presentation at the IART, given that CS-19 is part of the Impact Area. She said that she does not think that it is possible to study CS-19 without considering upgradient contamination within the Impact Area. She said that she feels that it makes sense for the IART to have a complete understanding of what is going on at CS-19, and therefore she is requesting that the IRP do the team the courtesy of presenting CS-19 information at an IART meeting. She noted that IART members have been asked to present to the SMB in the past and have done so an occasion.

Mr. Minior stated that the decision was made that the IRP will not present in this forum. He noted that CS-19 information is available to the NGB contractor. Ms. Adams asked Mr. Minior why that decision was made. Mr. Minior stated that the IART is an independent forum that has no relation to the clean-up program, for which the Air Force is the lead agent. He said that the IART has made it clear that it is not within the purview of the SMB, which is the forum within which the IRP works within. He reiterated that the IRP shares CS-19 data and processes with the NGB. He also said that the IRP and the NGB team currently are working on schedule coordination regarding the Central Impact Area and the CS-19 schedule to compare where the IRP is in the process with where the NGB is in the process. Mr. Minior stated that the IART is not a forum for the IRP; he explained that IRP representatives attend IART meetings to serve as a liaison for the IRP, but they are not active in the process.

Ms. Adams explained that the IART is asking for a CS-19 presentation, but does not intend to direct the CS-19 process. She suggested that the NGB think about this very carefully because it is responsible under Administrative Order 1 (AO1) and AO3 for a complete investigation of CS-19 as well as the rest of the Impact Area. She noted that it was agreed that in order to avoid duplication, the IRP would take the lead on CS-19, with the caveat that those studies be done to the standards that will satisfy AO1 and AO3. Ms. Adams told Mr. Minior that she thinks that the IRP could benefit from some comments that the IART has to offer concerning CS-19.

Mr. Hugus asked if EPA was aware of this decision prior to tonight's meeting. Mr. Borci said that up until a few minutes ago, he was under the impression that the IRP was going to present at least a brief presentation tonight. Mr. Hugus asked Mr. Minior why advanced notice was not given to EPA. Mr. Minior replied that, unfortunately, he reviewed the June 28, 2000 IART minutes today and had not been aware that a presentation was scheduled, nor was Mr. Aker aware that he was committed to presenting. Mr. Hugus remarked that a lot of backsliding is occurring which is similar to the days when the NGB would not allow the public to attend meetings. He noted that several IART members have requested that CS-19 be included in the Impact Area Study in order to avoid this very situation. He commented that, by refusing to make a CS-19 presentation, the Air Force Center for Environmental Excellence (AFCEE) is not being responsible or accountable to the IART citizen members. Mr. Hugus stated that the IRP has done nothing to address CS-19 in almost eleven years, and this announcement tonight is a continuation of the IRP doing nothing. He added that CS-19 is not a negligible problem in the Impact Area.

He also asked EPA to reconsider its decision on the bifurcation of sites and take CS-19 out from the auspices of the IRP in order to conduct a coherent study and not be at the mercy of the whims of Mr. Minior. Mr. Minior clarified that AFCEE made the decision.

Ms. Adams strongly suggested that the NGB consider whether it is in its own best interest to request that AFCEE present to the IART. She noted that she has been in several meetings with Mr. Tad McCall, who has pledged his full cooperation, which seems to be lacking tonight.

Ms. Garcia-Surette stated that she is very disappointed. She stressed that it is critical that everyone work together in order to succeed with the cleanup program at the Impact Area. She said that she feels that the request to have the IRP present to the IART on CS-19 is extremely reasonable. She noted that she relies heavily on the Remedial Project Manager (RPM) mechanism to work out these kinds of issues, and she is surprised by the decision. She strongly urged AFCEE to "step up to the plate" and make a presentation to the IART and at least try to make things mesh. She reiterated that she is very disappointed and she hopes that a positive resolution is reached.

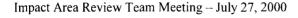
Dr. Feigenbaum asked Mr. Minior if the decision not to present to the IART was made today. Mr. Minior replied that it was. Dr. Feigenbaum asked if Mr. Gill was involved in the decision-making process. Mr. Minior replied that Mr. Gill was involved in the decision. Dr. Feigenbaum asked if it was, in fact, Mr. Gill's decision. Mr. Minior replied that Mr. Gill considered comments from his staff and the decision was made that the IRP will present to the JPAT on August 22, 2000. He also noted that the JPAT has been rescheduled from August 9, 2000.

Dr. Feigenbaum asked when the decision was made to reschedule the JPAT meeting. Mr. Minior replied that the decision to reschedule was made at yesterday's RPM meeting. Dr. Feigenbaum commented that he thinks this is short notice to reschedule a meeting. Mr. Minior said that the change was announced at last night's SMB meeting.

Mr. Minior then reiterated that all of the information the IRP has on CS-19 is provided to Ogden. In fact, CS-19 is included on Ogden maps that are available this evening. However, the IRP will not be making the presentation. Dr. Feigenbaum asked Mr. Minior if a CS-19 presentation will be made at the next JPAT meeting. Mr. Minior replied yes, and reiterated that the JPAT be part of the IRP forum. Dr. Feigenbaum stated that it is reasonable that protocol dictates that the JPAT is briefed first. However, it seems arbitrary and capricious to decide not to present to the IART.

Mr. Minior stated that all the CS-19 information is provided to Ogden and is in fact included in the presentation Mr. Grant will give this evening. Dr. Feigenbaum asked Mr. Minior if he is implying that Mr. Grant is going to make a CS-19 presentation tonight, or that Mr. Grant is capable of making such a presentation. Mr. Minior stated that Mr. Grant has the data and can present whatever the NGB team desires. Dr. Feigenbaum said that he thinks the IRP's decision is childish and he will bring it up at the JPAT meeting and ask the team to overturn the decision. Mr. Minior pointed out that the JPAT makes recommendations to the SMB, to which the IART is not responsive. Dr. Feigenbaum stated that he will ask the SMB to recommend that AFCEE cooperate with the IART.

Mr. Zanis noted that he has a personal interest in CS-19 and is very disappointed with AFCEE. He said that he probably should not have brought up CS-19 until Mr. John DeVillars submitted the order in 1997 because it has been a total waste of time. He stated that taxpayers' money has been spent on the study and now the citizens who spent the money are not being informed. He said that it boggles his mind.



Mr. Schlesinger asked Mr. Grant if he is able to provide an adequate presentation on CS-19, or if it would be better for the IART to hear a presentation from AFCEE. Mr. Grant said that he could provide a comprehensive CS-19 presentation, but he is not prepared to do so this evening.

Mr. Hugus asked EPA to acknowledge that he made the request that CS-19 be taken out of AFCEE's purview and be brought under the purview of the Impact Area Study. Ms. Adams said that she will take the request back to EPA for consideration. She also noted that EPA tried to include CS-19 in the Impact Area in 1997 and many Department of Defense (DoD) bureaucratic and regulatory objections were voiced. However, she is willing to raise the point again. Mr. Hugus said that he recalls the bureaucratic difficulties. He also noted that in 1997 he was assured that AFCEE would make a good faith effort to work with the IART; but that has changed, and he believes that this calls for action from the regional administrator.

Mr. Dow said that he attended last night's SMB meeting and the Guard presented on overview of the IART to the board. Five plumes were identified, including CS-19, and the Guard reported that a coordinated effort would be made to address CS-19 in a seamless fashion. Mr. Dow noted that there seems to be a disconnect between what was said last night and what is being said tonight. He recommended that someone from the IART contact the JPO and the SMB to ensure that this process is not disjointed.

Mr. Schlesinger stated that the team needs CS-19 information in a timely manner. He then asked whether Mr. Grant is capable of making an adequate presentation at the next IART meeting. He stressed that he does not want to ignore the coordination problem, but wants the IART to have the information.

## Agenda Item #2. Field Investigation Update

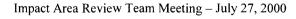
(see attachments #3 and #4)

## Status of Monitoring Well Installations

Mr. Grant noted that a plume map of Demolition Area 1 that includes the 100 parts per billion (ppb) contour lines is available tonight. He then reviewed the handouts that were provided to the IART members.

Mr. Grant reported that three monitoring wells (MW) have been installed since the last IART meeting; they are MW-108, MW-110, and MW-111, which is along the southern edge of the western Impact Area transect of wells. He stated that the next series of wells will be installed along Turpentine Road and will include P-23 at the southern end of the Impact Area, P-24, and P-25 in the northern end. He noted that these wells will be installed when there is opportunity to do so because there are a number of other operations currently taking place in the Impact Area. The High Use Target Area (HUTA) investigation may cause short-term limitations on the work on these wells.

Mr. Grant reported that a number of additional wells are planned for the Impact Area. These wells are numbered P-28 through P-39 and are included in the workplan that was submitted on June 30, 2000. The agencies recently provided comments on the workplan and responses to the comments currently are being prepared. He noted that EPA requested additional wells, which are not yet included on the map. He added that the workplan for wells P-28 through P-39 should be finalized soon and work should be completed by the end of the year. Mr. Grant also reported that



he is hopeful that final J Range workplans regarding additional well locations will be issued within the next couple of weeks. He reported that there is a total of 30 different drilling locations on the three ranges, one of which is located in Camp Good News and is replacing an IRP well.

### Status of Monitoring Well Sampling

Mr. Grant reported that the wells that were installed in Phase I have been sampled four times as of May 2000. He referred to the MW status graphic and noted that the sampling round is now complete for the Impact Area response wells. He clarified that these response wells recently were installed along the inner and outer transects in the Impact Area.

Mr. Grant stated that a fairly large sampling program, which is scheduled to begin in August, will include the fifth round of samples on the farfield Group 2 wells. Most of the other wells will be sampled for the fourth time. He reported that the Demo Area 1 response wells, which essentially are located in the middle of the Demo Area 1 plume, will be sampled for the third time.

Mr. Grant displayed Figure 2 and referred to sampling results. He reported that the graphic depicts the extent of Royal Demolition Explosive (RDX) in the Central Impact Area, and noted that the results are similar to the results from last month. He explained that Figure 2 depicts a plan view of the Central Impact Area and the location to the west. He pointed out four lines that extend out and noted that they represent paths of groundwater flow that have been modeled by the United States Geological Survey (USGS) using mod-flow. He explained that the paths do not relate to contaminant movement, but project where contaminants eventually would go if given enough time.

Mr. Grant stated that RDX detections also are included on the graphic. Yellow represents any detection of RDX and brown represents a detection above the health advisory of 2 ppb. He noted that the health advisory for RDX is fairly low and is close to the detection level. Mr. Hugus reminded Mr. Grant that at the last IART meeting he (Mr. Hugus) requested that high-concentration contour lines be included on the map. Mr. Grant said that he thought Mr. Hugus's request pertained to Demo Area 1. He noted that there is a separate handout available that depicts the 100-ppb contour line in Demo Area 1.

Mr. Schlesinger asked Mr. Grant if the reason the contour lines do not follow the particle track is because data is not available to support detects greater than health advisory, or because there are not wells there. Mr. Grant replied that it is because the data points at MW-106 and MW-44 do not show contamination either in the wells or in the profile samples. Mr. Schlesinger pointed out that the particle track indicates differently. Mr. Grant said that the particle track, which is probably for MW-2, suggests that the contamination at MW-2 came from a far-back location, and yet there have not been detections that far back. He stated that there are several possibilities: the contamination at MW-2 may have disappeared totally from an upgradient point, or there may be some unusual hydrogeological factor in this area that the model is not accurately accounting for. He reported that the interpretation of these contours will become clearer in the cross-section view.

Mr. Grant explained that the contours are based mostly on MW data. He noted that profile samples were used for MW-108 and MW-110 because results were not available. Mr. Zanis asked what was detected in MW-108 and MW-110. Mr. Grant replied that MW-108 shows a detection of RDX, but that MW-110 is clean. He reiterated that he is referring to profile sample results. Mr. Zanis said that he thought that trinitrotoluene (TNT) and a propellant were detected. Mr. Grant said that he is not sure about TNT, but that he believes that dinitrotoluene (DNT) was detected in some of the profile samples. He noted that there are sometimes problems with DNT

in the profile samples, and then it does not show up later in the MW. There may be some interference with the low-level detections. Mr. Grant recalled that the last fairly deep TNT detection that backtracked a long way had a photo-diode array (PDA), and he was surprised by that because TNT usually degrades quickly. It is hard to believe that the TNT could have made it out that far without degrading unless it had a fairly high-level source. Mr. Zanis asked whether the PDA proves that TNT is present. Mr. Grant replied that as well as he can determine the TNT is there. However, the science is not perfect, particularly with this analysis. He added that the determination of whether TNT is there is an analysis interpretation, and the analyst tends to be conservative and calls things "there" when there is uncertainty. Mr. Grant stated that it is important to recognize that the intent is to map the extent of detections, which is the first step in defining plumes.

Dr. Feigenbaum thanked the Guard and Ogden for preparing the data depicting the contour lines for both the maximum contaminant level (MCL) and the detection level. He noted that he and other citizens have been asking AFCEE, and before AFCEE the Air Guard, to present data in a similar manner, but the requests have been denied. He remarked that maybe now AFCEE will realize that it would be advantageous to present data in this form.

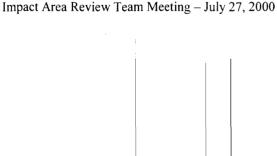
Mr. Schlesinger stated that the IART should be aware that Mr. Grant's presentation does not necessarily define a source. Although logically it does imply that the source can be found at an upgradient location, it is not necessarily the source but rather a point that is also higher than the health advisory. Mr. Grant concurred and stated that the area in question is not really being referred to as a plume at this point, but rather an area of detections. The data are not yet available to define from where the contamination is coming and whether or not the area is an actual plume.

Mr. Grant referred to the CS-19 data that he has received from the IRP, and said that it may be confusing to IART how much coordination exists between the IRP and the Impact Area Study. He reported that there is an AFCEE contractor at the weekly technical meetings and access is available to all of the CS-19 data from the IRP. He then pointed to an area on the graphic and stated that that particular piece of the detections roughly corresponds to what the IRP has drawn in its draft report on CS-19 as an area of RDX contamination above the health advisory level.

Mr. Grant referred to Figure 3 in the handout package, and noted that it depicts a view looking to the west down in the Impact Area at below ground surface. He noted the difference between the plan view and the section view depictions. He explained that that there is a horizontal and vertical gradient throughout most of the Impact Area; therefore, the contamination must have come from an area farther back to the east.

Mr. Grant stated that the extent of the contamination depth-wise is about 100 feet below the water as depicted in Figure 3. He added that the water table is generally 100 feet below ground surface. At this point in the Impact Area there is contamination extending from the top of the water table down about 70 feet with what appear to be, based on profile data, some clean layers of groundwater. The clean layer of groundwater is a result of the area upgradient where there is no contamination, which moves down and lies on top of the contaminated groundwater. Mr. Grant stated that there is also an area where the aquifer is much deeper and there are no RDX detections, at least at the points where the profiling was stopped. He explained that the depth of the profiling was based on the modeling experience and what was determined as reasonable in terms of potential upgradient source areas.

At Mr. Hugus's request, Mr. Grant displayed the outer transect (Figure 4) and pointed out that it looks a bit different. He said that the main difference is the clean layer of water on top of the



contamination. He referred back to Figure 2 and pointed out the areas of RDX detections and the areas that appear to be clean. He then displayed Figure 4 (section view) and referred to the different RDX detections. He pointed to a well that had a different level of RDX, and explained that this is significant because it suggests that the source area is close to the well and has not had the chance to move deeper into the aquifer. He reiterated that the results match well with the groundwater modeling.

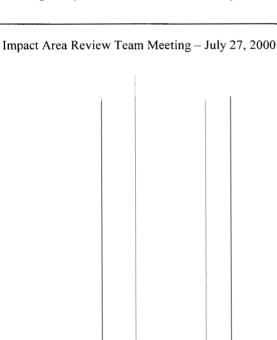
Mr. Cambareri asked about the contamination in MW-23. Mr. Grant stated that MW-23 is along the flow path of MW-42, MW-43, and MW-44 in addition to a few new wells. He said that there appears to be a higher level of RDX at MW-23, although the levels are very low. It is hard to say whether it is significant, but it has been climbing from a level of about 2 ppb to 6 ppb. Mr. Grant explained that MW-23 is behind MW-43. When following the flow path, which bends a little, the contamination at MW-23 is a little deeper and at a slightly higher level than MW-43. Again, it is a little bit misleading to suggest that there are definite boundaries because the levels are so low and so close to each other.

Mr. Zanis asked Mr. Grant if he is talking about RDX detections only. Mr. Grant replied that he is. Mr. Zanis asked if a map including explosive detections would be very pock marked. Mr. Grant replied that it would, especially if using the profile data results. He said that even when the PDA is used, the results do not always show up in the monitoring wells. He added that Her Majesty's Explosive (HMX) is occurring at most of the same locations as RDX. Mr. Borci pointed out that MW-39 is the exception. Mr. Zanis asked whether detections of other chemicals could be added to the map. Mr. Grant replied yes, but explained that the focus right now is on detections that exceed health advisory levels and RDX is the only one which does so in this area. He added that TNT is a factor in Demo Area 1.

Mr. Borci referred to the map depicting the inner transect and stated that data are being used to guide further investigations. He pointed out that MW-86 shows a surface detection. According to the plan view, the detection looks like it is from the vicinity of MW-99, which suggests that there is a possibility that the profile sampling does not go deep enough. Mr. Zanis asked whether this is a preliminary plume map. Mr. Borci replied that the plume map is preliminary and will be refined. Mr. Grant noted that additional wells will be installed to help define the extent of the contamination.

Mr. Schlesinger asked if more wells are planned downgradient from MW-23. Mr. Grant replied that access is an issue, and he pointed out that MW-42 is clean, which provides some information on the extent of the contamination. Mr. Borci referred to the map and pointed out that the red line that goes through MW-23 and MW-42 crosses through the old A Range, which is part of the Phase 2b investigation, so there will be a well out there based on some soil sampling grids.

Dr. Gschwend asked Mr. Grant to comment on surface soil sampling where the particle tracks end, and he asked whether there is a source detected that could explain the results. Mr. Grant referred to MW-26 and MW-59, for example, and said that there were water table occurrences. The thought was that the source was nearby and surface soil grids were done in an area about 100 feet upgradient. However, nothing was detected in the grids and it appears to be a "needle in a haystack" situation in terms of how much soil sampling would have to be done to find the source. He said that he is hopeful that measurements, fate and transport properties, and the unsaturated zone modeling will provide a better sense of how strong and wide a source would have to be and whether it could be found by soil sampling. Dr. Gschwend said that the fate and transport modeling is a simple one-dimensional picture without appropriate horizontal spread due to heterogeneity, and therefore it will not provide a good sense of the aerial extent. Mr. Grant noted



that he is at a disadvantage because he is not a modeling expert. He also said that he is under the impression that the modeling will indicate the level in soil that could have created the levels that are being detected at the water table.

Dr. Culligan stated that the unsaturated zone model is going to see dissolution on the surface and will direct vertical transport to the water table. She said that it would make as much sense to put a source on the water table at the point where backtracking begins and see if that would create the plume. She added that the unsaturated zone model that was selected will not provide any additional information as it is a direct transport from the surface to the groundwater. Mr. Grant suggested that this topic would be better suited for a technical meeting.

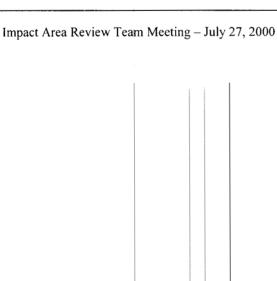
Mr. Borci referred to soil sampling and stated that the mortar targets sampling program included 11 targets that were scattered throughout the area and showed low levels of residue. He said that additional sampling was conducted at the intersection of Tank Alley and Turpentine Road at one of the armored personnel carriers, which appeared to be an artillery target. Significant residues were detected at this site. As a result, EPA asked the Guard to sample 34 targets located along Tank Alley and north along Turpentine Road. Therefore, a significant amount of data will be available over the next several months.

Mr. Grant stated that he is not suggesting that backtracking to where the groundwater flow indicates there is a source is particularly helpful in terms of trying to find the source with soil sampling. However, soil sampling around the targets may be very fruitful. Dr. Gschwend said that he thought running the mod-flow this way basically goes back to the water table, and to some extent indicates where an overhead source might be. Mr. Grant agreed that that is the potential of the MODFLOW (groundwater model), but noted that to date no sources have been identified with soil sampling. He added that he does not necessarily blame the model, which he feels is working fine. Dr. Gschwend pointed out that the model did not appear to be working fine in the case of MW-23 and MW-46, where there was cross flow. Mr. Grant said that it was not his intent to suggest that there was cross flow, but rather that there was not a complete picture at the inner transect. Perhaps there was contamination as far out as the well upgradient from MW-23.

Mr. Cambareri commented that there is not a point source of contamination, but rather a kind of a gross area of activity that has resulted in a massive amount of contamination.

Dr. Feigenbaum asked Mr. Grant to point out CS-19. Mr. Grant stated that the Guard depicts CS-19 in the same manner as does the IRP, which fits the results for that series of wells. He pointed out that it is heading in a slightly different direction than the flow paths, and noted that that is a technical issue regarding the zoom model used by AFCEE.

Mr. Schlesinger asked Mr. Grant what is being done to locate the source of CS-19. Mr. Grant replied that the first step is to define the extent of the contamination. He also noted that he thinks that the groundwater flow model will help to predict back to the source. Also the soil sampling at the targets, which are upgradient, may help to define a source. In addition, the HUTA investigation data will serve as another source of information, which may help to identify a source. Mr. Schlesinger asked if the targets are located along the road. Mr. Grant replied that the targets are concentrated along Tank Alley; there is also a series of targets that extend up Turpentine Road to MW-2. Mr. Schlesinger asked Mr. Grant how sampling downgradient of the boundary is going to help to identify the source. Mr. Grant replied that, in theory, defining the plume leads to a better understanding of whether there is a single source or multiple sources.



#### Latest Soil Data

Mr. Grant stated that a couple detonation craters were tested in the J 2 range and at one of the drilling locations. He reported that all were non-detect for explosives. He also reported that he received results from samples that were taken at the popper kettle located in the J-1 range in the vicinity of MW-58. He explained that the popper kettle apparently was used for disposal of munitions, possibly by some of the contractors. He said that the entire contents of the popper kettle were emptied and covered with plastic. Then the popper kettle was removed from its position, at which time soil samples were taken from underneath it. He noted that this area also was sampled as part of Phase I and was found to be non-detect. Mr. Grant stated that the ash from the kettle contained explosives and also a couple of metals. The soil beneath the popper kettle contained lead and antimony at levels that exceed the reportable concentration for soil under the Massachusetts Contingency Plan (MCP), which suggests that it becomes a MCP issue in addition to an investigation issue. Mr. Grant also reported that the soil did not contain explosives.

Mr. Hugus asked about the levels in the ash. Mr. Grant replied that the levels in the ash were elevated for TNT. However, he did not recall the other compounds, such as RDX, HMX, and TNT breakdown products, as being high. Mr. Dow asked Mr. Grant if the heavy metals in the ash were identical to the heavy metals that were detected in the soil, which exceeded the reportable concentration. Mr. Grant replied yes, and noted that copper and thallium were detected in the ash but not the soil.

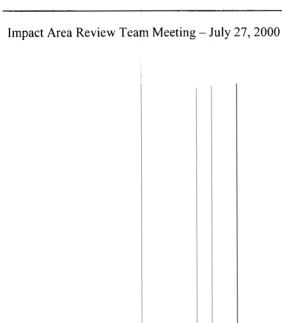
Mr. Zanis stated that he did a site walk of the popper kettle during Phase I when pointed out an area that should be sampled. He asked whether that area has been sampled. Mr. Grant replied that he did not believe that ash was sampled in Phase I, but soil samples from around the popper kettle were collected. Mr. Zanis asked if the black grainy dirt in front of the backstops next to the popper kettle was sampled. Mr. Grant was not able to recall a discussion about a particular color of soil at the thousand-meter range backstop. However, the area in question will be sampled because it is a location where Textron reportedly disposed of some wastewater from the J-3 Range.

Mr. Hugus asked why the soil beneath the ash does not have the same detections as the ash itself. Mr. Grant said that the soil is showing the metals, but not the explosives. Mr. Hugus asked Mr. Grant why explosives are non-detect. Mr. Grant replied that the he received the complete results for the ash this afternoon, and he thinks that further discussion is warranted. Mr. Hugus asked Mr. Grant to describe where the soil samples were taken from. Mr. Grant replied that three samples were taken in the area at several different depth intervals. Mr. Borci said that a monitoring well is proposed for that location as part of the J Range investigation. Mr. Hugus suggested that the sampling be improved in that area.

## Latest UXO Findings

Mr. Grant reported that there was a significant UXO finding this month. He noted that 27 munitions were found in the J 2 range at P-4, which is located in an area historically known as Disposal Area 1. Also, 92 mortars were discovered in three locations beneath the surface. These discoveries were made when preparations were under way for monitoring well installation. He reported that the rounds will be detonated and soil samples will then be taken.

Mr. Schlesinger asked why the detonation chamber is not being used for the rounds. Mr. Grant replied that he is not sure why the chamber is not being used because it is a UXO issue. Mr.



Borci stated that EPA was told that the chamber would not be used in this case because of the fuses that are on the mortars. He explained that the J Range was used to test fuses and it is fairly difficult to determine whether the fuses are live or inert. Therefore, the conservative approach is to treat all the rounds as though they are live. Mr. Schlesinger inquired about the age of the mortars. Mr. Borci replied that he believes that a few of the mortar rounds had lot numbers that dated back to the mid to late 1970s, which corresponds with the information that is available about the testing of fuses in the range.

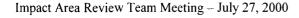
Mr. Hugus asked Mr. Grant to identify the 27 items. Mr. Grant replied that 21 of the items are 81-millimeter (mm) mortars, 3 are 60-mm, and 3 are 155 projectiles. Mr. Hugus commented that this is a serious collection of explosives and asked how wide the area is where they were found. Mr. Grant replied that the drill pad is about 150 feet by 150 feet and the known disposal area is about 30 to 40 feet wide by 60 to 80 feet long. Mr. Hugus clarified that the area is approximately a 150 feet in diameter. Mr. Grant replied yes, and noted that is how far the UXO contractor would do the intrusive clearance to make sure the drill rig would not run over something.

Mr. Hugus asked if searches were done any farther out. Mr. Grant replied no but noted that the J-2 Range is part of the munitions survey. A geophysics instrument is being used over 35 acres in the J 2 range in an attempt to determine what sort of magnetic anomalies are present. Mr. Hugus asked whether Tetra Tech or explosives ordnance disposal (EOD) personnel found the UXOs. Mr. Grant replied that the discovery was made by the UXO contractor in the process of clearing the area for drilling. Mr. Borci noted that Tetra Tech has flown the area as part of the aerial survey. In addition, the area in question already was selected to be examined as part of the munition survey. Mr. Hugus asked whether the aerial survey detected any burial sites. Mr. Borci replied that Mr. Montroy would address that later. However, he believes that the data from the aerial survey still is being evaluated. Mr. Hugus stated that more explosives have been identified in the Camp Edward Impact Area by virtue of clearing for drill pads than have been detected in dedicated UXO searches. He remarked that he thinks it is unfortunate that the NGB has not revealed the locations of UXO, especially when people's lives are at stake.

Mr. Schlesinger asked Mr. Borci if there are plans to search for more burial sites. Mr. Borci replied yes, and explained that the location of the MW was chosen based on interview information from at least two individuals who indicated that buried items may be in the pit. The well location is downgradient from that area. He stated that the same interview information identified several other disposal areas, and the first find may be just the tip of the iceberg. He said that he is confident that the entire area will be covered in detail.

Dr. Feigenbaum asked whether all the UXO that were found are going to be blown in place. Mr. Grant replied that he believes they will. Dr. Feigenbaum said that this sounds like "deja vu all over again". He said that it was a situation like this that prompted the acquisition of the mobile detonation chamber. He then referred to last night's SMB meeting and said that it was his understanding that 92 buried mortars were lined up and dragged out of the ground. He asked why it was not feasible then to bring the detonation chamber to the mortars. Mr. Borci stated that the fuses in question are probably the most dangerous type of fuses that could be on these rounds. Therefore, the UXO experts stated, and EPA agreed, that the mortars would be blown in place. Dr. Feigenbaum asked about the other 27 items that were found and whether the detonation chamber could be used for them.

Mr. Iaiennaro, UXO specialist with the Groundwater Study Office, stated that all rounds were detonated at about 3:00 p.m. this afternoon. He noted that it was determined that all 119 munitions were wax or plaster filled. However, the three 115-mm's did have hazardous fuses,



which, when detonated caused the rounds to split open. Also, one 81-mm in one of the disposal pits had a hazardous fuse that detonated. Essentially all the rounds were inert; however, there were four hazardous fuses. Mr. Iaiennaro stated that it is EOD procedure to blow the rounds in place if the fuses do not have inert markings.

Dr. Feigenbaum asked under what circumstances then is the detonation chamber utilized. Mr. Iaiennaro reported that 405 items, including 81-mm's, have been detonated in the chamber. The rounds either did not have fuses or had fuses that permitted movement. He also noted that a number of items are awaiting detonation in the chamber. He said that the chamber has been shut down for a couple of weeks due to other contractor activities taking place within the exclusion area where the chamber is located. He added that he thinks the chamber will begin operating again on August 24, 2000. Dr. Feigenbaum asked Mr. Iaiennaro whether the chamber is mobile. Mr. Iaiennaro replied that the chamber is not mobile and will stay where it currently is located, which is a proved location by the DoD Explosives Safety Board.

Mr. Zanis asked if one of the reasons the military has strict rules about burying ordnance is because years later, when found, it would be difficult to identify its condition. Mr. Iaiennaro replied yes, under current standards, burial is not permitted. Mr. Zanis stated that he has copies of the standards from the 1940s, which state that burying of munitions is strictly forbidden. Therefore, the problems that are being faced now are due to people breaking regulation. Mr. Iaiennaro said that he does not believe that he is qualified to respond.

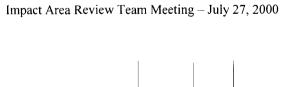
Mr. Schlesinger asked if the well that will be installed in Camp Good News is a replacement well. Mr. Grant replied that it is more or less a replacement well. He said that the IRP had a well at this location, but it seems to have shifted to a point where it is no longer usable.

### Agenda Item #3. Small Arms Range Investigation

Mr. Gregson reported that the IART was provided with a copy of the sampling plan for the small arms ranges and comments on the plan were then submitted to Mr. Borci. He said that he, Mr. Borci, and other members of the technical staff reviewed the comments, which were then incorporated into the revised plan. He noted that some additional sampling also was incorporated into the plan. The revisions were provided in the response to comment letter that was mailed out earlier this week.

Mr. Gregson then referred to the air monitoring portion of the small arms range investigation and reported that air monitoring was conducted last Friday during an M-16 firing event at the C Range. Results will be available within a few weeks. He pointed out that it was a relatively small firing event where only a few hundred rounds were fired. Based on the results, a second air monitoring event will be scheduled at a training episode that includes firing of more rounds.

Mr. Hugus asked Mr. Gregson if he knew in advance that the firing event was going to be small. Mr. Gregson replied that it is difficult to predict who is going to use what range when and how many rounds will be fired. Another complicating factor is weather conditions. Mr. Hugus said that he understands that weather is not predictable; however, the firing schedule should have some predictability. He asked Mr. Gregson if he is communicating with the Guard about its schedule. Mr. Gregson replied that he is in communication with the Guard. However, the training schedule and the use of the ranges is something that has been difficult to nail down. Mr. Hugus asked if the schedule is a national security issue. Mr. Gregson replied that he is not aware that it is. Mr. Hugus said that he thinks it is absurd that air monitoring was conducted when so few rounds were fired. Mr. Gregson explained that the decision was made to conduct the sampling.



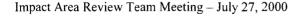
The event was smaller than what he would have liked, but the decision was made to collect the data. If contamination is detected, then there is definitely a problem; if it is not, then additional sampling at larger events will be scheduled.

Mr. Hugus referred to the presentation of the soil sampling plan, and reiterated that the only information he received about the small arms range soil sampling plan was a three-page memo. One page was a cover letter from Mr. Grant, in which he mentioned the soil sampling pattern, and then there were two pages, which provided all the content that this team has had so far on what is called "the plan". Mr. Hugus noted that previously soil sampling plans have been distributed in bound notebooks, and have been fully prepared and disseminated. Mr. Gregson explained that the small arms sampling plan was developed at the request of the citizens, rather than as a formal requirement under the administrative order handed down by EPA. He explained that he attempted to make the plan concise, easily understood, and easily implemented, rather than something that follows the usual process, which includes defining the background of the situation, looking at previous investigation data, and coming up with a plan.

Mr. Hugus remarked that the two-page plan left out a lot of information. He noted that it was because of the poor presentation of the plan that he requested that team members be allowed to witness both the air and soil sampling events, and he just noticed in the response to comments that this request has been denied. He then asked who decided that members of the IART would be subject to safety precautions. Mr. Gregson replied that the military safety policy regarding live firings only allows for members of the military to be present. Witnessing the soil sampling event becomes an Occupational Safety and Health Administration (OSHA) issue, and there are exclusion zones for sampling at potentially contaminated sites. Mr. Hugus asked, for example, whether the citizens who live around the base should not be able to come anywhere near contaminated soil. Mr. Gregson replied that there are exclusion zones for hazardous waste site investigation operations where only OSHA-trained personnel are allowed to be present.

Mr. Hugus commented that he feels there is a credibility problem here. He reiterated that the presentation of the plan was so poor that he thinks that the testing will not be done in good faith. Also, the exclusion of the team members from the site during testing confirms his fears that the sampling will not be done properly. He added that he believes that it is untrue that there are safety issues. Mr. Gregson stated that the sampling will be done in as good faith as any part of the groundwater investigation. He noted that the intent of the study is to provide data upon which IART can rely, and EPA has the opportunity to provide oversight to the work. Mr. Hugus agreed that EPA is present to provide oversight, but added that Mr. DeVillars asked the citizens to become part of the IART to provide oversight as well. Mr. Hugus stated that the citizens fill an important role too, and they believe that they have the right to know what is going on. He remarked that if there are safety issues, perhaps the shooting should stop altogether and the people on Greenway Road should not be subjected to these events. He stated that there are a lot of contradictions surrounding this issue and he does not accept the refusal to allow citizen members to be present during sampling.

Ms. Drake said that she understands the concerns raised by Mr. Hugus. She asked him what specific additions he would like to see to the workplan. Mr. Hugus replied that he would like to see an actual workplan in the first place. He explained that a typical workplan includes aerial photographs, pictures of where the soil samples will be, a narrative on those soil samples, and how they will be conducted. Also, a typical workplan includes a history of the site and arguments as to why these are the best sites to study. He said that as it stands right now, the citizens had to come up with a proposal for the soil sampling grid, which was accepted wholesale because of the flaws in the original plan.



Dr. Stahl asked if the purpose of the soil sampling is to determine the effects of a discreet event or the accumulation of effects. He noted that the proposed plan suggests that sampling will take place as far as six inches down, which is too deep if the purpose is to sample following a discreet event. He said that sampling for a discreet event would have to be taken immediately after an exercise because the contamination would be directly on the surface and not six inches down. Mr. Gregson replied that the purpose is to study both discreet event effects and cumulative effects. He noted that the selected areas have a history of high use. He also said that he is willing to consider the recommendation; perhaps zero to three inches would provide a better representation. Dr. Stahl said that if the intent is to sample immediately following an event, it would be best to sample just the surface because sampling down six inches would average out most of the contamination. Mr. Zanis agreed with Dr. Stahl and suggested that the depth of sampling be limited to the first quarter inch of soil. Dr. Stahl suggested that something be placed on the ground to capture the residual amount as it falls. Mr. Zanis seconded Dr. Stahl's suggestion.

Mr. Borci stated that the Guard went out of its way to get this plan together. He said that the same level of detail has been put into other plans and accepted for other areas such as sampling underneath C4. He noted that the workplan was presented at a minimum of two IART meetings, and input was provided at that time. He explained that the intent is to gather the initial base layer of information. Also, he noted that it was agreed at a previous IART meeting that once the initial information was analyzed, a more detailed plan would be discussed. Dr. Feigenbaum said that he did not recall that discussion. Mr. Borci stated that conversations about a plan date back several months. He added that the lesson has been learned, and in the future only formal workplans will be submitted. However, the Guard has incorporated all comments from the IART, and it is time to gather the data and then include the extra level of detail, if warranted.

Mr. Zanis said that he would like to see the original plan withdrawn, and he noted that he was too busy to review the draft. He commented that he thinks that this study is going to become one of the most important sampling programs conducted on the base, and there should be a formal workplan in place. Dr. Feigenbaum said that he does not necessarily agree that the whole plan should be withdrawn, but he does think it needs to be revised. He said that he agrees with Mr. Hugus that he plan was not done in a good procedural way, and he noted that there are even disagreements about when the plan was discussed previously. He said that he does not recall any meeting minutes reflecting discussions on the plan other than whether the sampling would take place before or after an event. He stated that it appears that the plan was put together hastily and is flimsy. He noted that he, Mr. Hugus, and Mr. Zanis reviewed the plan and made some comments about sampling being done too close to the firing line, and about sampling discreet events. However, it did not occur to them that another technique could be used to sample the surface. He said that Mr. Borci has persuaded him that there is a need for cumulative data, which means sampling the soil. Dr. Feigenbaum suggested that the plan include sampling for both cumulative and discreet sample effects. He stated that the plan is being created at the table because of the faulty process and he urged the Guard to consider whether the plan should be totally rewritten and formalized, or revised to include surface monitoring. He said that he wonders whether the formal order could be amended to include the study. Dr. Feigenbaum then agreed with Mr. Zanis that the study may prove to be one of the most important sampling events conducted on the base and it should not be looked at in such a casual manner.

Dr. Feigenbaum said that it seems to him that the response to comments letter was written rather hastily. He said that he does not understand the use of the word "utilized" on the second page and said that it is not clear what the sampling grid plan is. Mr. Gregson explained that the plan

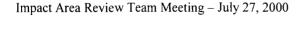
includes a five-point grid pattern so that the results can be compared to other similar sampling events, such as the gun and mortar positions. Dr. Feigenbaum asked whether the five points would be discreet samples. Mr. Gregson replied that the five-point grid will have two composite samples; the first sample will be taken from the zero to six-inch interval and the second from the 18 to 24-inch interval. Dr. Feigenbaum stated that a zero depth sample should be included because it does not make sense to think that the residuals that are released immediately following a firing event would migrate down 24 inches right away. Mr. Gregson said that the cumulative effects will be identified in the deeper samples. Dr. Feigenbaum pointed out that the immediate effects will not be identified. He asked what is the purpose of waiting to take the sample right after a firing event. Mr. Gregson replied that, as Mr. Borci mentioned, the purpose is to gather some data. There is always the option to collect additional data, if warranted. Dr. Feigenbaum stated that there is no point in collecting the samples immediately following a firing event because that will only reflect the cumulative effects.

Mr. Borci stated that the fact is that right now there are no data, and the point is to start somewhere. After the first round of data are collected then the team can discuss the details. All the information to date indicates that the zero to six-inch layer is the place to start looking. Mr. Borci then asked the citizen team members if they wanted the current plan to be modified or completely resubmitted.

Dr. Feigenbaum suggested that the current plan be modified to include surface soil sampling. Mr. Zanis agreed with Dr. Feigenbaum. Mr. Schlesinger reiterated the comment made by Dr. Stahl and suggested that surface samples be collected on some sort of tarpaulin. Mr. Gregson said that that sounds simple, but pointed out that there is not going to be an inch layer of ash that lands on the tarp. Mr. Hugus said that the citizens should not be in the position to determine how the ash is collected. He suggested that some sort of absorbent media, like that used in air sampling, be considered. Mr. Gregson said that the air sampling should accomplish the same results. Mr. Hugus said that he is interested in what lands on the ground.

Mr. Hugus then asked if Mr. Gregson is aware of a day when heavy firing is scheduled. Mr. Gregson replied that three ranges have been selected and, as indicated in the plan, there is more than one goal. The idea is to study ranges that have a history of high use, which is why the A Range was selected. He said that once the final plan is in place, he will coordinate with Camp Edwards to determine when the sampling will occur. Mr. Hugus stated that it was not until tonight that there was any question about going ahead with the plan. He asked Mr. Zanis to withdraw the request he made to scrap the original plan entirely. Mr. Zanis stated that the A Range is a propellant range and asked whether the position of the guns and the landscape have been taken into consideration. He also mentioned that the JPO invited certain members of the public to watch the firing of weapons last year and asked why IART members can not do the same thing. Mr. Hugus again asked Mr. Zanis if he will withdraw his request to scrap the first plan. Mr. Zanis agreed to do so. Mr. Hugus pointed out that at the last IART meeting Mr. Gregson stated that he was ready to move forward with sampling and now there is not even a date set. Mr. Gregson explained that the additional comments have delayed the process. He asked LTC Bailey when the next high-firing date is scheduled. LTC Bailey said that he does not have that information available this evening.

Ms. Adams said that it seems as though there is agreement to move forward with the existing plan as Phase I. She suggested that a Phase II be added to include the immediate effects of firing. She acknowledged that many technical questions about firing would have to be addressed as part of Phase II. However, Phase I can be implemented now, and she believes that the team should be made aware of when that will take place. Dr. Feigenbaum asked if there is agreement that Phase



II will be added to the original plan. Ms. Adams replied that that is her understanding. Dr. Feigenbaum said that it is his understanding that Phase II is not contingent on the results of Phase I. Ms. Adams agreed with Dr. Feigenbaum and asked Mr. Gregson if the NGB also can agree. Mr. Gregson replied that he thinks there are no problems with that plan.

Mr. Zanis told Ms. Adams that studies on M-16s, which were conducted in the 1980s, indicate that something is out there. Ms. Adams reiterated that Phase I will examine the cumulative effects and Phase II will address a particular firing event.

Mr. Hugus said that he likes the suggestion that Dr. Stahl made about using an absorbent material for the surface sampling.

Dr. Stahl pointed out that there is no reason to wait for a firing event to test for the cumulative effects. In fact, waiting until immediately after a firing event may bias the data. He suggested that a porous material be used for the surface-sampling event.

Dr. Feigenbaum said that he does not know about the fate and transport of the materials in question, and he suggested that the zero to six-inch samples be taken following a firing. He then asked if Phase II could be written up formally. Mr. Gregson agreed to formalize Phase II and its results. He said that there will be a report completed on Phase I, which will assess the cumulative effects, and a workplan will be presented to the IART on Phase II, which will address the immediate effects of a firing event.

Mr. Borci suggested that the TOSC members and citizen members refer to the gun and mortar technical memorandum regarding the detection of propellants in the zero to six-inch interval.

## Agenda Item #4. Munitions Update

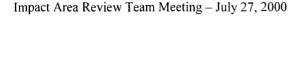
(see attachment #5)

Mr. Montroy reported that there are a number of different sites under investigation. He said that data from a couple of sites have been presented to the regulators at the Thursday technical meetings. The next step is validation, which includes the excavation of some of the anomalies.

Mr. Montroy displayed a map depicting the demolition area. He said that vegetation was cut down and a geophysical record was produced. The data were analyzed and there appears to be a fair number of geophysical anomalies. He said that large anomalies will be removed as they might be source items. Also, there is a section in the Demolition Area, referred to as the upland area, where it appears that there were smaller detonation cells. The vegetation and fire scars in the soil have a different look. He summarized that there are essentially two different activities going on in the Demolition Area.

Mr. Montroy reported that a wheeled cart is used to detect anomalies. It sends a signal into the ground and metal pushes the signal back up where it is detected by the cart. The amount of the signal that is pushed back up is dependent on such variables as the mass, the shape, and the type of metal. He noted that it is not generally right to say that the larger the signal, the larger the object but that is what usually occurs.

Mr. Montroy showed an example of the 2 millivolt (mV) scan, which indicates that there is metal everywhere in the Impact Area. He said that the decision was made to increase the threshold in order to dismiss the smaller pieces of metal. He reported that 45 mV detected 381 mortars in the



prove-out area. He explained that studying large signals isolates the large anomalies. Mr. Montroy noted that further investigation will determine whether the large anomalies are single or multiple items. He pointed out that most of the larger anomalies are located in the basin area; but the investigation will include the upland area of the Demo Area as well. He said that ten anomalies were selected and will be physically located with the global positioning system (GPS.) He stated that the anomalies have to be treated as though they are live ordnance items which means that excavation will be conducted by UXO experts in an exclusion area. He also noted that soil samples will be taken at the same time and provided to Ogden for chemical analysis.

Mr. Montroy mentioned that there is also an effort to map the demolition activity using field notes and the geophysical survey.

Mr. Zanis asked Mr. Montroy whether the metal was picked up in the area when it was cleared from brush. Mr. Montroy replied that the area was picked up as well as they could. Mr. Zanis asked Mr. Montroy how deep the detections are going. Mr. Montroy replied that the EM-61 that was used sends a signal down about a meter and a half.

#### **Gun and Mortar Positions**

Mr. Montroy reported that data have been presented to the regulators on 12 gun and mortar (G&M) positions. He said that the threshold was raised to 45 mV at G&M 10 and 11. Again, the idea is to excavate only large anomalies. Mr. Zanis asked if the detected anomalies could be rocks. Mr. Montroy replied that only metal is being detected.

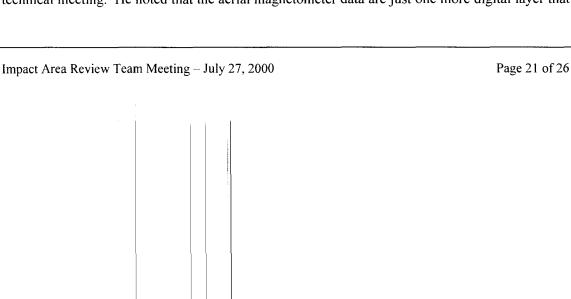
#### Water Bodies

Mr. Montroy reported that depth surveys were conducted at five water body sites, including one in Camp Good News. He said that the geophysical contractor used an innovative technology, which he described as an EM-61 that is fixed on a float and has real-time GPS. The instrument is towed behind an electric motor zodiac. Mr. Montroy noted that there are a number of water bodies are located under power lines, which interfered with the electromagnetic signals. He explained that the underwater UXO will be photographed with an underwater camera because the best way to excavate underwater UXO is to drain the pond, which is not desirable. Ms. Garcia-Surette asked if people are using the ponds. Mr. Cody replied that all the base ponds and wetlands are posted as off limits.

Mr. Zanis asked Mr. Montroy if he has all the ponds on his computer. Mr. Montroy replied that he does not. Mr. Zanis inquired about the J-3 wetland. Mr. Montroy stated that the J-3 wetland will be looked at when camping season has ended. He explained that basic metal detectors will be used in this case because it is a regulated wetland.

## Airborne Magnetometer

Mr. Montroy explained that he originally was against the idea of using an airborne magnetometer because a variance of this technology with which he was involved in the past proved not to be very successful. However, Mr. Borci persisted and it seems as though he was correct. It appears that some useful data have been collected. He noted that the data set is very complex and will require a lot of data massaging before getting anything useful out of it. He added that the data was received yesterday and he is hopeful that the regulators will be briefed on it at the next technical meeting. He noted that the aerial magnetometer data are just one more digital layer that



will be added to the Geographic Information System (GIS) to identify areas within the rest of the Impact Area.

Mr. Montroy displayed a photograph of the helicopter that was used for the airborne magnetometer and noted that it flies at approximately 40 to 50 knots. He said that real-time GPS is feeding in at 100 times a second and calculation adjustments have to be made each time the helicopter leans or sways. Mr. Montroy also reported that the helicopter flew over a prove-out area at 15, 12, 10, 8, and 6 meters, which is as low as possible, to determine the size of the smallest object that can be detected. Mr. Zanis asked Mr. Montroy how deep the helicopter system penetrates. Mr. Montroy replied that he does not know yet how deep the penetration is.

Dr. Gschwend asked Mr. Montroy if he plans to compare the water bodies and demo area data with the data from the airborne magnetometer. Mr. Montroy replied that there will be some overlap of information. Dr. Gschwend asked Mr. Montroy whether the helicopter could fly over the basin in the demo area, for example, to see if the same anomalies are detected. Mr. Montroy replied that this was not done, but probably could be done.

### J Ranges

Mr. Montroy reported that work currently is ongoing in the J-2 range. He said that 26 out of the 30 acres have been cleared; however, his crew has to leave every time any UXO are found. He explained that the geophysical survey data will be overlaid on the aerial data, which theoretically, will provide a total picture of the area.

Mr. Montroy reported that Tetra Tech recently has been tasked to begin work on 75 acres in the J 1 range, which will be a significant amount of work. He also noted that there are eight sites in the J 3 range where a geophysical survey will be conducted.

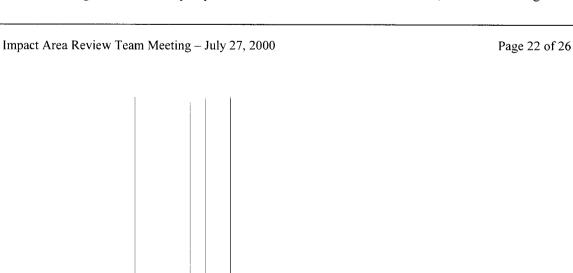
## High Use Target Area

Mr. Montroy stated that it is not known exactly what happens to UXO as it ejects out of a ballistic trajectory and lands in the Impact Area. Therefore, the plan is to characterize the discreet units. He added that Ogden will also use the information in terms of identifying potential sources. Photograph interpretations were used to identify the six 10,000-square-foot test plots, which will be excavated lift by lift. The sand will then be sifted and UXO will be removed. GPS will be used to locate every UXO. Mr. Montroy said that all UXO will be catalogued by photographs and, where appropriate, the ordnance will be sampled for constituent contamination.

Mr. Montroy stated that data from the aerial magnetometer survey, GPS, sub-surface geophysical survey, and particle backtracking will be utilized in the HUTA. He added that a fairly large amount of excavation activities planned before the UXO process begins. He also reported that he is waiting for responses to comments from the regulators on the workplan.

Mr. Zanis asked Mr. Montroy if the site in question was chosen based on a 1966 photograph. Mr. Montroy replied that a combination of factors were involved in choosing the site location, including the fact that it is an historical target area. Also, crater density analysis was used, as was particle backtracking.

Mr. Hugus asked Mr. Montroy what connection Tetra Tech had with the recent UXO discoveries at the J-2 range. Mr. Montroy replied that Tetra Tech was not involved; he said that Ogden's



UXO contractor discovered the UXO while clearing the road. Mr. Hugus inquired about the airborne survey that was conducted in the area. Mr. Montroy stated that the airborne survey took place about four weeks ago, but the data were received yesterday. Therefore, he is not sure whether or not the UXO was picked up by the airborne survey yet. Mr. Hugus said that he is pleased that Tetra Tech is conducting a thorough UXO survey. However, he would like to see less emphasis on research and calibration and more on actually finding UXO in the ground. He noted that there are EOD personnel all over Camp Edwards yet most of the UXO has been detected while clearing for drill pads.

Dr. Stahl asked if it is correct that Mr. Montroy is trying to determine whether fragments are contributing to contamination. Mr. Montroy replied that the intent is to identify all potential sources of contamination. Dr. Stahl pointed out that only metal is being studied, and he asked Mr. Montroy if soil samples will be taken from around the discovered fragments. Mr. Borci explained that Tetra Tech will be utilizing the Cold Regions Research and Engineering Laboratory (CRREL), which uses cutting edge technology regarding wipe samples from fragments.

Mr. Schlesinger inquired about the assumption that has been made that large fragments are connected to pollution more so than small fragments. Mr. Montroy explained that a fragment from a piece of ordnance, as opposed to a target, theoretically would have a higher likelihood of residuals. He stated that the intent is to rule out or rule in fragments as a potential source. Dr. Stahl asked Mr. Montroy what is being done about low-order detonation items. Mr. Montroy explained that any low-order detonation rounds that are safe to work with will be excavated, white tested, and photographed. He added that the soil surrounding the round will be sampled as well as the area vertically, about every foot or so.

Ms. Frawley thanked Mr. Montroy for his presentation.

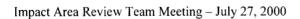
#### Agenda Item # 5 Other Business

### Information Request Responses

(see attachments #6 and #7)

Ms. Adams reported that EPA submitted questions regarding the mustard gas study; those questions were answered by AFCEE and JPO. She said that EPA also requested information from the 102<sup>nd</sup> Fighter Wing (FW) regarding EOD work in the J Ranges; EPA received a response from MSgt Perra. Unfortunately the response did not come from the entire unit, but just from MSgt Perra. She said that EPA will follow up with the 102<sup>nd</sup> FW regarding the response.

Ms. Adams reported that EPA recently received a large amount of information from Textron. She said that a box full of documents was received, and a copy of the contents is at the Groundwater Study Office. Mr. Hugus asked if anyone from the EPA has reviewed the documents. Ms. Adams replied that she, Ms. Dolan, and Mr. Borci have all skimmed the Textron documents, and she is now conducting a more systematic review of them and is about a quarter of the way through. Mr. Hugus asked Ms. Adams if she believes that the documents contain pertinent information. Ms. Adams replied that some of the information is hard to understand, but there seems to be a fair amount of information regarding the melt/pour facility in the J-3 range. There is also some information about the depleted uranium (DU) liners that were loaded at the J-3 range.



Mr. Hugus said that he skimmed over the response from MSgt Perra. He then asked if the 102<sup>nd</sup> FW does not feel obliged to answer these questions because the questions were not directed to the Office of Public Safety. Ms. Adams replied that the argument from the 102<sup>nd</sup> FW is that it is not a political sub-division of the state, but rather a sub-division of a political sub-division of the state, and therefore it is not required to answer the questions. She said that it is unfortunate that the Massachusetts NGB is not more forthcoming with information. Mr. Hugus concurred with Ms. Adams and said that answers are coming from 102<sup>nd</sup> FW lawyers rather than from EOD personnel, which lends to the lack of credibility that has been discussed at various points during this meeting. Mr. Hugus commented that this is an indication that good faith between the military and the community is breaking down.

Mr. Schlesinger asked Ms. Adams about the attachment to the mustard gas response. Ms. Adams explained that the response referenced a public health assessment done by the Agency for Toxic Substance and Disease Registry (ATSDR) in California. She noted that she pulled the assessment off the Internet and attached it to the document. Mr. Schlesinger pointed out that in 1996 the Guard stated that its activities did not pose any threat to the public. He asked why this response statement should be believed more than any other. Ms. Adams suggested that Mr. Schlesinger ask COL Freeman that question.

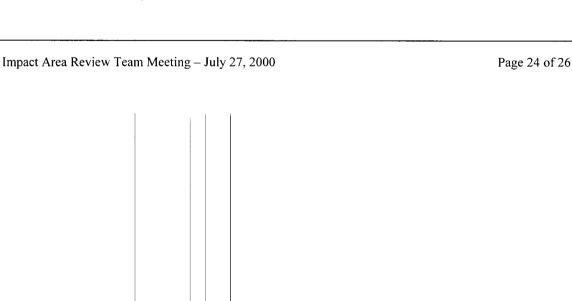
Mr. Zanis asked Ms. Adams if the AVCO archives will be made available. Ms. Adams replied that AVCO was merged with Textron, and she believes that a number of AVCO documents are in the Textron information response.

### TOSC Support

Mr. Schlesinger reported that funding for the Northeast Hazardous Substance Center, which funds the TOSC program that supports the team's technical assistance, has run out. He noted that only five bids of the 20 submitted for the various centers will be refunded. He said that he wanted to make the regulators and the Guard aware of the situation before support of the technical assistants is terminated. He also commented that the technical assistants have been helpful to the citizen members and the study. Mr. Schlesinger asked the regulators and the Guard whether they are aware of any opportunities that could help to continue technical support in the event that the Northeast Hazardous Substance Center is not refunded. He stated that Mr. Bill LiBrizzi offered to submit a request to have the technical assistance extended for an additional year. Mr. Schlesinger asked the regulators if they are willing to submit a similar letter of support. Ms. Frawley said that she would like a copy of Mr. LiBrizzi's letter, and she agreed to follow up with a complimentary letter of support.

Mr. Hugus asked the Guard whether the Technical Assistance for Public Participation (TAPP) program would be useful to the team.

Mr. Hugus then inquired about whether the technical assistants could attend the weekly technical meetings. He said that he thought that EPA's legal department had to approve this decision. Mr. Borci said that he has spoken to Mr. LiBrizzi about this issue, and it was determined that funding is not available for TOSC members to attend each technical meeting. Mr. Hugus stated that the TOSC members want to attend the technical meetings that address issues of particular interest to them. Mr. Borci agreed with Mr. Hugus and said that he thought that the IART citizen members met with the TOSC members before tonight's meeting in an attempt to develop a list of priorities in which they are interested. He said that he would receive a copy of the list and then let TOSC members know when topics of interest to them are scheduled to be discussed.



Mr. Hugus asked if funding is the only issue that prevents the TOSC members from attending the meetings weekly. Mr. Borci replied that funding is the only issue. Mr. Hugus asked if there are some legal questions about TOSC members attending the meetings. Mr. Borci replied that there are not any legal issues regarding TOSC members attending the technical meetings. Dr. Gschwend asked, for example, whether a TOSC member could attend any technical meeting without being paid. Mr. Borci replied that a TOSC member could do so. Dr. Gschwend said that he was not under that impression four hours ago, but perhaps he had not had the right information.

Ms. Grillo referred to the Technical Assistance Grant (TAG) program, which awards grants for up to \$10,000. She pointed out that it is a competitive process and said that she will let the IART know when the next funding round is scheduled. She also noted that DEP recognizes the value of the TOSC members to the citizen members.

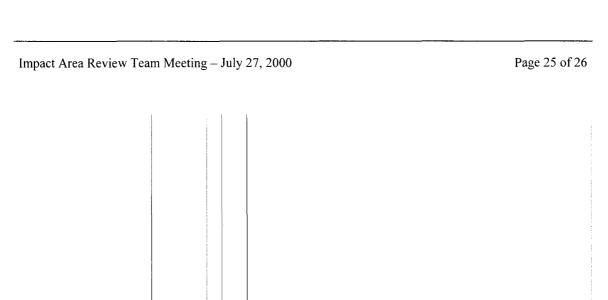
#### JPO Environmental Notification Form (ENF)

Mr. Borci, in Mr. Cambareri's absence, reported that the public comment period for the Environmental Assessment (EA) for the 3 million gallons a day (MGD) water supply project ends on August 14, 2000. He told team members to contact the JPO directly if they are interested in receiving a copy of the report. Ms. Frawley clarified that Mr. Kent Gonser is the contact person at the JPO. Mr. Schlesinger asked whether the team is planning to comment formally on the ENF. It was explained to Mr. Schlesinger that the IART, as a team, would not be submitting comments, but that individuals are welcome to do so.

## Agenda Item #6. Set Next Meeting Date, Review Action Items, and Adjourn

#### Action Items:

- 1. Dr. Feigenbaum requested that LTC Bailey provide the IART with a written document that identifies the specific ranges and the circumstances under which the small ranges on Greenway Road will be used.
- 2. Mr. Hugus requested that the MAANG provide the IART with a written inventory of personnel carriers and artillery weapon systems located on site, specifying which are being used, those that are no longer in use, and those that will be sent off site.
- 3. Mr. Hugus and Mr. Schlesinger requested that MAARNG provide a complete ASP inventory to the IART before the next IART meeting. If a complete inventory cannot be provided, Mr. Schlesinger requested that MAARNG provide information on the constituents of concern that remain in the ASP. It was requested that this be an agenda item for the September IART meeting.
- 4. EPA requests that the IRP present the CS-19 briefing to the IART at the September meeting.
- 5. Dr. Feigenbaum requested that Ogden make a presentation at the next IART meeting on the CS-19 plume, if the IRP does not make that presentation.
- 6. Mr. Hugus requested that EPA reconsider its decision that gives joint authority to both NGB and IRP for the cleanup of CS-19.



- 7. Mr. Zanis requested that soil samples be taken at the backstop area near the popper kettle at the J-1 Range.
- 8. The Small Arms Range Soil Sampling Plan will be revised and conducted in two phases:
  - a. It was agreed to schedule the soil sampling event detailed in the revised Phase I workplan, as soon as possible. Ogden will not however, prepare a new workplan for the Phase I work. NGB will notify the IART of the date of the Phase 1 sampling event as soon as it is scheduled.
  - b. Regardless of the results of the Phase I sampling, NGB agreed to develop a detailed and comprehensive Phase II Small Arms Range Soil Sampling workplan, which will include surface soil sampling immediately after firing and address issues raised by Dr. Stahl. This will take the form of a formal workplan which will be sent to the IART for comment, as other workplans are.
- 9. Mr. Schlesinger requested that NGB identify options (i.e. PIP) to continue the technical advisory support for the citizen members of the IART, currently provided by the TOSC program, should that program's grant not be renewed.
- 10. DEP will notify the IART of the date of the next funding round for the state's TAG program.
- 11. EPA will contact Mr. LiBrizzi, TOSC Program Director, to offer EPA-NE and DEP's continued support of the services provided by the program to the citizen IART members.
- 12. Beginning immediately, draft IART meeting agendas will contain more specific information on items that will be discussed during both the Field Investigations Update and Other Issues portions of the monthly meetings.

Ms. Frawley stated that the next IART meeting is scheduled for Thursday, September 7, 2000. She thanked everyone for attending and adjourned the meeting at 9:54 p.m.